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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

In re SILICON STORAGE TECHNOLOGY,
INC., DERIVATIVE LITIGATION

Master File No. C 06-04310 JF

**STIPULATION AND ~~PROPOSED~~
ORDER FOR FILING AMENDED
COMPLAINT AND MOTION TO
DISMISS BRIEFING SCHEDULE**

This Document Relates To:
ALL ACTIONS.

Trial Date: None

1 WHEREAS, on July 7, 2009, this Court issued an order granting the Director Defendants'
2 Motions to Dismiss with respect to the federal claims and allowing Lead Plaintiffs leave to amend
3 the Second Verified Consolidated Amended Shareholder Derivative Complaint;

4 WHEREAS, Lead Plaintiffs have requested and Defendants have consented to allow Lead
5 Plaintiffs additional time to file a Third Verified Consolidated Amended Shareholder Derivative
6 Complaint ("Amended Complaint");

7 WHEREAS, a Case Management Conference has been set for November 6, 2009;

8 WHEREAS, subject to the Court's approval, the parties stipulate as follows:

9 1) Lead Plaintiffs shall file an Amended Complaint by August 21, 2009;

10 2) Defendants shall move to dismiss, or otherwise respond to, Lead Plaintiffs'
11 Amended Complaint by September 24, 2009;

12 3) Lead Plaintiffs shall file any opposition to Defendants' motion(s) to dismiss by
13 October 28, 2009;

14 4) If Defendants file and serve a reply to Lead Plaintiffs' opposition, they will do so by
15 November 16, 2009;

16 5) The hearing on Defendants' Motions to Dismiss or other responsive pleading and
17 Case Management Conference shall be set for December 4, 2009 or other day as ordered by the
18 Court.

19 By executing this Stipulation, the parties have not waived and expressly retain all claims,
20 defenses and arguments whether procedural, substantive or otherwise. This Stipulation is without
21 prejudice to any subsequent motion to stay this action, or any objections or defenses thereto, and
22 this Order is entered without prejudice to the rights of any party to apply for a modification of this
23 Order.

24 IT IS SO STIPULATED.

25 DATED: July 16, 2009

Respectfully Submitted,

26 BARROWAY TOPAZ KESSLER
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/S/ Nichole Browning

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DATED: July 16, 2009

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DATED: July 16, 2009

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DATED: July 16, 2009

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/S/ Howard S. Caro

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I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on July 16, 2009.

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- (No manual recipients)